

**REMARKS**

Reconsideration of this application, as amended, is respectfully requested.

Claims 1 and 3-19 are currently pending in the application. It is gratefully acknowledged that the Examiner has again allowed Claims 8-19, and still finds allowable subject matter in Claims 4-7.

In the Office Action, the Examiner has again rejected Claims 1-3 under 35 U.S.C. § 102(e) as being anticipated by *Heinonen et al.* (U.S. Patent 6,438,385 B1).

With regard to independent Claim 1, the Examiner asserts that *Heinonen* teaches all the recitations of this claim. However, upon reviewing the Examiner's rejection and cited art, it is respectfully submitted that *Heinonen* does not specifically teach using a sub-BTS. That is, by definition, a sub-BTS is another BTS operating underneath a main BTS, as is illustrated in FIG. 3 of the present application. In *Heinonen*, however, in FIG. 2, there are three different BTSs (BTS, BTS1, and BTS2) with a common overlap area, with none of these BTSs being a sub-BTS of another.

Additionally, as indicated above, Claim 1 has been amended to more specifically recite relationship of the main-BTS and the sub-BTS, as is recited in the allowed claims. Therefore, it is respectfully submitted that Claim 1 is patentably distinct from *Heinonen* as *Heinonen* makes no reference to a sub-BTS operating underneath a main BTS.

Additionally, it is respectfully submitted that *Heinonen* merely discloses including a predetermined message for controlling a mobile station as a muting state and transmitting the same on a BCCH channel of each base station, regardless of the existence of a sub-cell (or sub-BTS).

However, as recited in independent Claim 1, the present invention teaches determining if a mobile station is controlled as a muting state using a beacon paging group frame for a sub-cell, and if a terminal is located in the sub-cell, determining a paging alert mode of a mobile communication terminal according to the beacon paging group frame.

Accordingly, it is respectfully submitted that *Heinonen* merely discloses including a predetermined message on a BCCH channel, but fails to teach a beacon paging group frame for a sub-cell, as recited in Claim 1.

Further, it is respectfully submitted that *Heinonen* merely discloses that a mobile station determines an alert mode according to a predetermined message of a BCCH message, only when the mobile station receives the BCCH message. That is, it is respectfully submitted that in *Heinonen*, the mobile station neither determines whether the mobile station itself is located in a sub-cell nor determines a paging alert mode according to the beacon paging group frame, as recited in Claim 1.

At least for the reasons stated above, it is respectfully submitted that Claim 1 and dependent Claims 3 are patentably distinct from *Heinonen*, and it is respectfully requested that the rejections of Claims 1 and 3 be withdrawn.

Accordingly, all of the pending claims, i.e., Claims 1 and 3-19, are believed to be in condition for allowance and issuance of a notice of allowance is respectfully requested. The Examiner is requested to contact the undersigned if there are any questions regarding this communication.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul J. Barrell", is written over a horizontal line.

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